

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States Of America

v.

Trevor Lee O'Dowd,
Defendant.

Case No.: 24-6135MJ

CRIMINAL COMPLAINT

SEALED

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

Between March 12, 2024, and March 13, of 2024, in the County of Maricopa in the District of Arizona, the defendant Trevor Lee O'Dowd did knowingly transmit in interstate and foreign commerce a communication containing a threat to injure the person of another, that is posting comments and messages to <http://www.facebook.com> threatening to injure and kill attendees of the Red Carpet Event to be held in Tempe, Arizona, on April 7, 2024, with the intent to communicate a true threat of violence and with recklessness as to whether the communication would be viewed as a true threat of

In violation of Title 18, United States Code, Section 875(c).

I further state that I am a Special Agent from the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attached Statement of Probable Cause, Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: Yes No

AUTHORIZED BY: Maria R. Gutierrez, AUSA


Digitally signed by
MARIA GUTIERREZ
Date: 2024.04.02
10:44:58 -07'00'

SA, John Wlasuk

Name of Complainant

Subscribed and sworn telephonically before me on

April 2, 2024@1:08pm

Date

HONORABLE ALISON S. BACHUS

United States Magistrate Judge

Name & Title of Judicial Officer

John Wlasuk


Digitally signed by John
Wlasuk
Date: 2024.04.02
10:34:34 -07'00'

Signature of Complainant

at Phoenix, Arizona

City and State



Signature of Judicial Officer

STATEMENT OF PROBABLE CAUSE

I, John Wlasuk, being duly sworn, hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since June 2022. I am currently assigned to the Phoenix Field Office in Phoenix, Arizona. I am a member of the Joint Terrorism Task Force (“JTTF”) and am primarily responsible for investigating acts of domestic terrorism. As a Special Agent of the FBI, my duties and responsibility include conducting criminal investigations of individuals and entities for possible violations of federal laws, particularly those laws found in Title 18 of the United States Code.

2. This affidavit is made in support of a criminal complaint and arrest warrant for Trevor Lee O’Dowd (“O’DOWD”) for violations of 18 U.S.C. § 875(c), Interstate Communication of a Threat to Kidnap or Injure. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnessed. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

THE INVESTIGATION

3. On or about March 14, 2024, Meta Platforms Inc. (“Meta”)¹ provided the FBI with a series of Facebook posts, comments, and messages that were made on or about March 12, 2024, by two separate accounts believed to be used by O’DOWD. Meta deemed these posts, comments, and messages threatening in nature. On or about March 18, 2024, FBI-Phoenix became aware of these posts, comments, and messages. Along with the contents of the posts, comments, and messages, Meta included limited subscriber

¹ Meta is a social networking company that owns and operates Facebook, a free-access social networking website that can be accessed at <http://www.facebook.com>. Facebook users can then use their accounts to share communications, news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

information and recent IP addresses. Below are the contents of some of the posts, comments, and messages that Meta shared with the FBI.

4. On March 12, 2024, a Facebook user with the name “Orange Tsauce” and unique identification number 100063894466016 (“Orange Tsauce”) posted the following:

- “If they go im going on a rampage im just letting yall know before it happens. I better start seeing respect.”;
- “Anyone got an AK I can barrow. Bout to go end some lives since u think I'm never gonna make it.”;
- “I suggest hiring more security for ur events soon.”;
- “I got alotta time to buy some guns u sure u don't wanna say sorry orange.”;
- “don't show up to mill Ave that day is all imma say”²;
- “You better come find me before April 7th hits. Or the Jokes on you. #aprilfools”; and
- “I wouldnt report me now it's Def happening”.

5. On March 12, 2024, Orange Tsauce also sent the following message to a Facebook user: “yeah well maybe we could fix it somehow. I've been trying with my entire life force and talent for years. after all this I'm starting to think guns work better.”

6. On March 12, 2024, Orange Tsauce also exchanged messages with another Facebook user (“User 1”):

- Orange Tsauce: “no I have no reason to live”;
- Orange Tsauce: “sooo easy enough right”;
- User 1: “You have so much reason to live. And taking people with you isn't a good thing. You're just proving the haters right at that point. I know it's easier said than done but you have to rise above and I know you have the talent and strength to do so.”;

² Unlike the other posts referenced in this paragraph, Meta classified this comment as a “comment shared” by the user Orange TSauce.

- User 1: "You're not chill. You're threatening peoples lives. Innocent people at that.";
- Orange Tsauce: "yep aren't I the worst somebody should've loved me.";
- User 1: "So you're gonna prove all of them right?"; and
- Orange Tsauce: "Yep. That's the plan".

7. Meta provided the following subscriber information for the account used by Orange Tsauce: date of birth, a contact telephone number, and trevyorange@gmail.com. Meta provided the FBI with recent internet protocol ("IP") addresses of 209.181.98.172 located in Peoria, Arizona; 8.48.3.98 located in Glendale, Arizona; and 71.223.93.71 located in Peoria, Arizona.³ In addition, Meta provided investigators with the alias: trevy.orange.7.

8. On March 12, 2024, a Facebook user with the name "Trevor Orange" and unique identification number 61557319709714 ("Trevor Orange") sent the following messages to another Facebook user:

- "so be scared I just suggest you don't be one of my opps";
- "because I'm going on a rampage after my mom's gone";
- "I'll kill every single one of my opps and leave because nobody really loves me.";
- and
- "cuz im over relationships I'd rather kill every b**** that does me dirty from now on so f*** you".

9. Meta provided the following subscriber information for the account used by Trevor Orange: "Trevor Orange" as the listed name on the account, and date of birth. The date of birth listed on the Trevor Orange account is the same as the date of birth listed on

³ An IP Address is a unique address that devices such as computers, tablets, and smartphones use to identify themselves and communicate on a network. IP Addresses can provide a general location of a device being used to access the internet.

the Orange Tsauce account. Meta also provided investigators with the alias: trevor.orange.25.

Screen Captures of Facebook Posting and Comments by Orange Tsauce

10. On or about March 14, 2024, FBI investigators viewed Orange Tsauce's publicly available Facebook pages.⁴ The following messages were posted on or about March 13, 2024:

- Orange Tsauce: "April 7th will be the last day for AZ hip hop. T'\$auce Out";
- User 2: "What does that mean";
- Orange Tsauce: "don't show up to mill Ave that day is all imma say";
- Orange Tsauce: "NO invite to the red carpet event in AZ the state I run and nobody's actually from huh. Okay. bet. Least I know where ull all be."; and
- Orange Tsauce: "hmm red carpet event huh. I highly suggest not going to that one. Hope u brought toys to play with."

Identification of April 7th Event in Tempe, Arizona

11. FBI investigators determined that there will be a Red Carpet event in Tempe, Arizona, on April 7, 2024 ("Red Carpet Event"). The Red Carpet Event will be at a venue on Mill Avenue and it is scheduled to start around 7:00 p.m. and end around 2:00 a.m. on April 8, 2024.

12. On March 20, 2024, FBI investigators interviewed the organizer for the Red Carpet Event ("the organizer"). The organizer said he did not personally know "Orange Tsauce" but had interacted with "Orange Tsauce" on Facebook after becoming aware of threatening messages posted on March 12, 2024. The organizer is considering hiring armed security based on Orange Tsauce's Facebook posts and messages. The organizer provided

⁴ After March 18, 2024, the profiles were no longer publicly available to view; however, screenshots of the publicly available pages were taken and saved,

FBI investigators with screenshots of a Facebook Messenger conversation with Orange Tsauce.

13. In the conversation between the organizer and Orange Tsauce, Orange Tsauce claimed to feel disrespected. Orange Tsauce advised the organizer not to show up for the Red Carpet Event. Orange Tsauce advised that gathering everybody for the event made it easier for him. The organizer mentioned that a lot of white people and models will be at the Red Carpet Event. Orange Tsauce replied, “perfect, I hate b****es to so, at least that’s what they say about me”. Orange Tsauce responded it would be a wild west shootout on Mill Ave “like the good old days” when the organizer mentioned calling the police. Orange Tsauce added, “I have no reason to live.”

14. The organizer also provided screenshots of Facebook posts that Orange Tsauce made. Orange Tsauce made public posts saying, “U know my mom’s dying and I get dissed by the female black community for being soft and creative????? THE F*** KIND WORLD WE LIVE IN?”, and “Someone In this city better come up with 25k or i go buy some ammo ur choice”.

Identification of Other Online Monikers Associated with Orange Tsauce and Trevy Orange

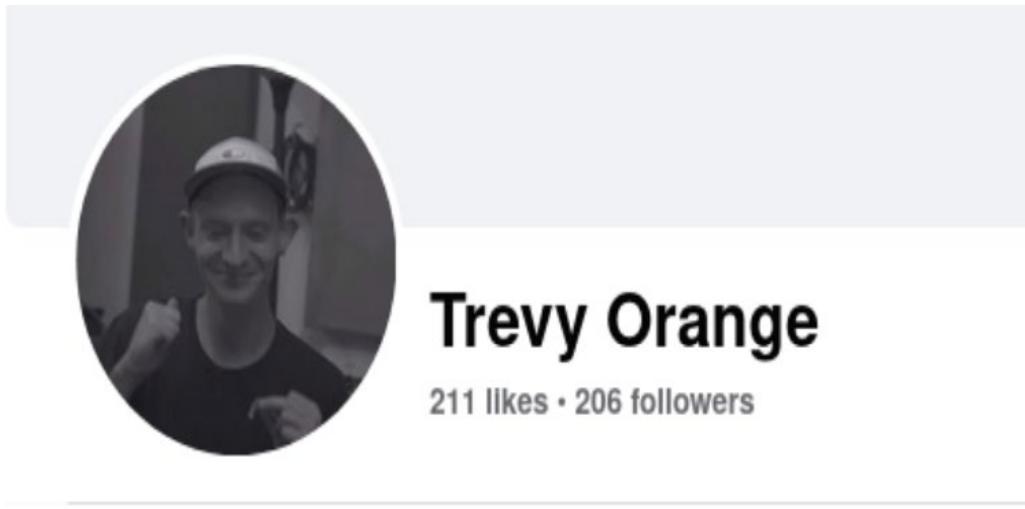
15. To identify the user the moniker Orange Tsauce and Trevy Orange, FBI investigators searched Facebook and other social media platforms for “Orange Tsauce” and other similar monikers. The following profiles that I believe are also used by the user of the Orange Tsauce and Trevor Orange monikers were found.

/ / /

/ / /

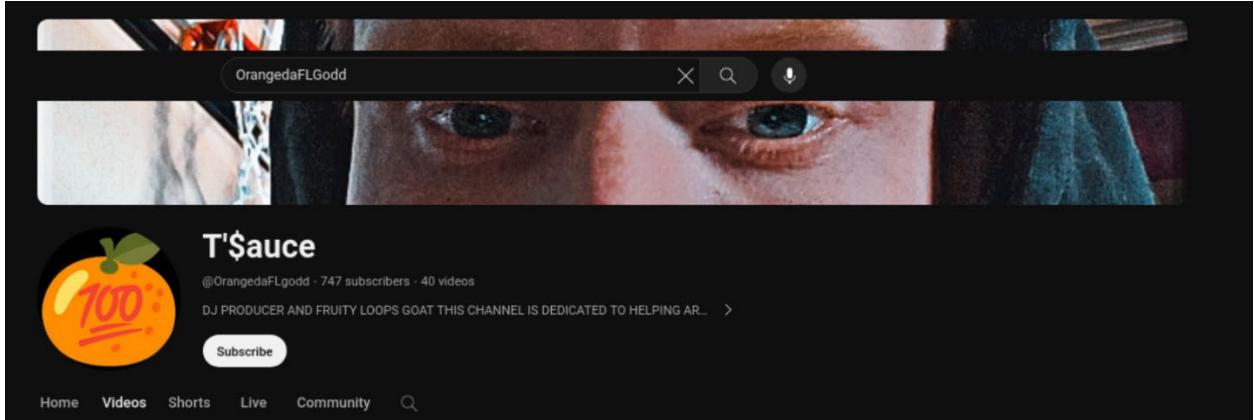
/ / /

Facebook profile with the moniker of “Trevy Orange”



X Profile with the moniker Orange Tsauce and YouTube Channel T'Sauce

A screenshot of an X (formerly Twitter) profile for the account "OrangeTsauce". The profile picture is a cartoon illustration of a man with a beard, wearing a red hoodie with an Adidas logo, sitting in a bathtub filled with orange juice. To the left of the main profile picture is a smaller circular thumbnail showing a close-up of the same character. The account name "OrangeTsauce" is at the top, followed by the handle "@Orange2Tsaucy". A bio below the handle reads: "Saucy, Wavy, and got the Juice. 🍊💯 Orange is a Dancer, Producer, and Emerging Artist from AZ, with a style that will brighten u UP! Yt:OrangedaFLGodd". At the bottom, it shows "Arizona, USA" and "Joined January 2022". There are "Follow" and "..." buttons at the bottom right.



16. The profile on X, which was formerly known as Twitter, using the display name “OrangeTsause,” username “@Orange2Tsaucy” identifies the user as located in Arizona, USA, and stated "Orange is a Dancer, Producer, and Emerging Artist from AZ, with a style that will brighten u UP! Yt:OrangedaFLGodd". I believe that “Yt:OrangedaFLGodd” is a reference to a YouTube channel for username “OrangedaFLGodd”. FBI investigators reviewed a YouTube page for “OrangedaFLGodd” and discovered the profile to contain a display name of “T’Sauce”. Based on the information on social media and as explained further below, I believe O'DOWD uses the monikers Orange Tsauce, Trevor Orange, “Trevey Orange”, and other similar monikers. I also believe O'DOWD uses the YouTube channel “OrangedaFLGodd”.

Identification of O'DOWD as Orange Tsauce and Trevor Orange

17. Records with the Arizona Department of Motor Vehicles show that O'DOWD has the same date of birth as the subscriber for the Orange Tsauce and Trevor Orange Facebook accounts. Records show that O'DOWD uses an address on Bell Road in Phoenix as well as an address on Rockland Drive in Prescott Valley. O'DOWD had registered a 1998 Jeep Grand Cherokee, Arizona license plate APA5WS, and vehicle identification number 1J4GZ78Y6WC165723 (“Vehicle 1”). Vehicle 1 is registered to the Rockland Drive address.

18. On March 21, 2024, FBI investigators compared social media profiles that were publicly available to Arizona Driver's License ("AZ DL") pictures for O'DOWD. Below is an AZ DL photograph taken in 2022. It was compared to the above Facebook profile for "Trevy Orange". The individual in the pictures is the same.



License Plate Reader Hits and Location of Vehicle 1

19. On March 15, 2024, about three days after the Facebook postings above started, at approximately 8:20 p.m. a license plate reader located on Mill Avenue in Tempe,

Arizona between 3rd and 4th street recorded Vehicle 1 heading southbound. The LPR camera is located approximately 1.5 to 2 blocks away from the Red Carpet Event location.



20. On March 26, 2024, the Honorable John Z. Boyle, Magistrate Judge, District of Arizona, authorized a warrant to track a telephone used by O'DOWD ("Telephone 1"). That same day, the Honorable John Z. Boyle, Magistrate Judge, District of Arizona, authorized a warrant to track Vehicle 1. Based on tracking information for Telephone 1 and Vehicle 1, and physical surveillance, FBI investigators confirmed that O'DOWD uses Telephone 1 and Vehicle 1. Additionally, tracking information for Telephone 1 and Vehicle 1 show that the devices are located at Walmart parking lots in the Phoenix metro and Prescott areas during the overnight hours except for the overnight hours of March 31, 2024. During the overnight hours of March 31, 2024, Telephone 1 and Vehicle 1 were located at the address on Rockland Drive in Prescott Valley. Physical surveillance has further shown that O'DOWD is the sole occupant of Vehicle 1. Moreover, based on

tracking information for Telephone 1 and Vehicle 1, and physical surveillance, it appears that O'DOWD is transient and living out of Vehicle 1.

21. Based on the facts set forth in this affidavit, there is probable cause to believe that O'DOWD committed the offenses as alleged in the Complaint.

John
Wlasuk

Digitally signed by
John Wlasuk
Date: 2024.04.02
10:34:54 -07'00'

John Wlasuk
Special Agent, Federal Bureau of Investigation

SUBSCRIBED AND SWORN TELEPHONICALLY BEFORE ME THIS 2d DAY OF APRIL, 2024.


HONORABLE ALISON S. BACHUS
United States Magistrate Judge